

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**COLUMBIA HOUSING/PNC  
INSTITUTIONAL FUND IV LIMITED  
PARTNERSHIP, COLUMBIA  
HOUSING SLP CORPORATION,  
OCWEN 2000-LLC, PNC BANK, and  
COLUMBIA HOUSING/PNC  
FUND IV, INC.,**

**Plaintiffs,**

**v.**

**OCWEN FEDERAL BANK FSB,  
OCWEN INVESTMENT  
CORPORATION, and OCWEN  
LOAN SERVICING, LLC,**

**Defendants.**

**NINTH JOINT MOTION TO STAY PROCEEDINGS  
TO ACCOMMODATE SETTLEMENT DISCUSSIONS**

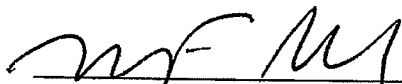
All parties to these actions, by their respective undersigned counsel, move this Honorable Court for an Order staying all proceedings through March 21, 2008.

The parties respectfully submit that there is good cause for the requested stay. The parties previously executed a non-binding settlement memorandum, “which outlines the basic terms and conditions upon which [the parties] are willing to enter into a formal and definitive settlement agreement.” Subsequently, the parties engaged in active attempts to finalize the “formal and definitive settlement agreement” and related documentation, in an effort to reach a business resolution. The parties have now executed an Escrow Agreement as part of that settlement process, and believe that they are nearing completion of the formal and definitive settlement agreement. The proposed settlement transaction is complex, and involves a total of thirteen projects, not just the projects involved in this litigation. The parties have agreed that the

prospects of finalizing such a settlement will improve if they can focus their full attention towards settlement without the distraction of substantial discovery and pre-trial preparation. The parties previously requested stays and were able to use the time to make significant progress toward finalizing a settlement, and now request the additional time to finalize the agreement.

WHEREFORE, all parties to this action request that this Honorable Court stay all proceedings in the above-referenced matter through March 21, 2008, in order to allow the parties to accommodate settlement discussions.

**SAUL EWING LLP**



Michael F. Bonkowski (No. 2219)  
222 Delaware Avenue, 12<sup>th</sup> Floor  
Wilmington, DE 19801  
(302) 421-6863  
mbonkowski@saul.com

**HOLLAND AND KNIGHT LLP**

Joshua C. Krumholz, Esq. (*pro hac vice*)  
Elizabeth M. Mitchell, Esq. (*pro hac vice*)  
Benjamin M. McGovern (*pro hac vice*)  
10 St. James Avenue  
Boston, MA 02116  
(617) 523-2700

**ECKERT SEAMANS CHERIN &  
MELLOTT, LLC**



Michael G. Busenkell (No. 3933)  
Margaret F. England (No. 4248)  
300 Delaware Avenue, Suite 1360  
Wilmington, DE 19801  
(302) 425-0430  
mbusenkell@eckertseamans.com

**ANDREWS KURTH LLP**

Charles L. Perry (*pro hac vice*)  
Texas State Bar No. 15799900  
1717 Main Street, Suite 3700  
Dallas, Texas 75201  
(214) 659-4681

**CERTIFICATE OF SERVICE**

I, Michael G. Busenkell, certify that on November 7, 2007 I caused a copy of the foregoing Ninth Joint Motion To Stay Proceedings To Accommodate Settlement Discussions to be served in the manner indicated on:

**Hand Delivery**

Michael F. Bonkowski  
Saul Ewing LLP  
222 Delaware Avenue  
Wilmington, DE 19801

**Facsimile and U.S. Mail**

Joshua C. Krumholz  
Holland & Knight LLP  
10 St. James Avenue  
Boston, MA 02116

A handwritten signature in black ink, appearing to read 'MGB', is written over a horizontal line.

Michael G. Busenkell (No. 3933)

